

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC.,
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS, and VERIZON CORPORATE
SERVICES GROUP, INC.,

Defendants.

CIVIL ACTION NO. 2:23-CV-00352

JURY TRIAL DEMANDED

AGREED MOTION FOR EXTENSION OF TIME TO FILE E-DISCOVERY ORDER

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Cellco Partnership, d/b/a Verizon Wireless and Verizon Corporate Services Group, Inc. (collectively, “Verizon”) hereby stipulate and agree, with the Court’s permission, to an extension of time for the Parties to file a Proposed E-Discovery Order from **November 21, 2023** to on or before **December 1, 2023**.

The Parties do not file this Agreed Motion for purposes of delay, but rather to allow the Parties adequate time to address the deadlines, obligations, and protections afforded by this proposed order, particularly in light of the upcoming Federal holiday on November 23, 2023.

DATED: November 21, 2023

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*Attorneys for Defendants Cellco Partnership,
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CERTIFICATE OF SERVICE

I hereby certify that, on November 21, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Katherine Q. Dominguez
Katherine Q. Dominguez

CERTIFICATE OF CONFERENCE

I hereby certify that, on November 21, 2023, counsel for Verizon conferred with counsel for Plaintiff Headwater Research LLC and that this Agreed Motion is unopposed.

/s/ Katherine Q. Dominguez
Katherine Q. Dominguez